

## Anti-Corruption Policy and Guideline

### 1) Prevention Policy Relating to Anti-Corruption Matters

HARN define establishes and enforces through all the organization an explicit “Anti-Corruption Policy” comprising of definitions, responsibilities, implementations, and measures within Anti-Corruption Measures Handbook. The Board approved on May 10, 2018 which is an ISO 9001:2015 certified document. The Board, executives, employees, subsidiaries, joint ventures, other companies that control and agents (if any), are strictly required to acknowledge and comply with this policy.

Define Anit-Corruption Policy an explicit, all the Board, executives, employees, subsidiaries, joint ventures, and other entities that may have a control over including agents (if any), prohibited or commit or accept any kind of corruption at all means. For direct and indirect benefits to personal and relevant parties neither one is a receiver or a giver or an offer of bribe both monetary and non-monetary to the government or private, and partners that HARN exercise business, it has continuous operations and development as follows:

1. HARN enlisted in the declaration of intention to join Thailand Private Sector Collective Action Coalition against Corruption (CAC), with from March 21, 2018, organized by the Thai Institute of Directors (IOD), which won certification membership in the 3rd quarter of 2018 and won continuously certification for the first in the second quarter of 2021, demonstrate its firm intention in anti-corruption. HARN is committed to good governance, code of conduct, and business ethics that are responsible for the community, society, and environment, including all stakeholders in the entire supply chain.
2. Since 2018, HARN has begun enforcing Anti-Corruption Policies as part in Anti-Corruption Measures Handbook. The policies, revised in 2021, to be contain essential principles and guidelines embracing resistance to fraud, by defining as part of the way of Corporate Governance and Code of Conduct so that may observe the same standards and management approaches.
3. HARN’s Anti-Corruption Policy forbids HARN’s director, executives and employees to carry out or participate in corrupt practices as well as all forms of bribery offer or acceptance direct and indirect. They must seriously observe the Anti-Corruption Policy, which covers various processes, including donation to charities, human resources administration, supply procurement, and internal control, etc.

### 2) Guidelines for Overseeing the Compliance with Anti-Corruption Practic

To be in accordance with the latest anti-corruption policy HARN adopted, provides guidelines for overseeing the compliance, as follows:

1. Assign directors management and staff to assess the compliance with corporate governance policies and principles, business ethics and the Anti-Corruption Measures Manual every year.
2. Follow up to regularly review and improve the anti-corruption policy every year in order to ensure that HARN’s operations comply with changes in business, regulations and relevant legal requirements. It must be presented to the Audit Committee and reported to the Board of Directors on a quarterly basis.
3. Assign the Quality System Management Department to inspect and monitor the implementation of anti-corruption policy measures by various departments through internal quality audits and report to the Chief Operating Officer, Chief Financial Officer, and the management review meeting every month by presenting to the Risk Management Committee. It must be reported to Board of Directors on a quarterly basis.
4. If from information from the audit or complaints found by the investigation there is reasonable evidence to believe that there are transactions or actions that may have a significant impact on the financial status and HARN’s performance, including any breach of the law, the Code of Business Conduct/Ethics, guidelines for corruption prevention, or questions about financial report or internal control system, the Audit Committee will report to the Board of Directors in order to take corrective action within the period the Audit Committee deems appropriate. An investigation will be conducted without disclosing the whistleblower’s name in order to protect the potential impact on the whistleblowers of the complaint or allegation.

### 3) Communication, Training, and Task Highlights

In order to strictly guide the behavior of directors, executives and all employees, including subsidiaries, joint ventures, other companies controlled by the company, including business representatives (if applicable) and other relevant external, require communication and training. The anti-corruption actions are as follows:

1. Communicates its Anti-Corruption Policy and guidelines to its subsidiaries, associates, and other HARN-controlled companies, business partners, and stakeholders as well as the public through assorted channels including letters, e-mails, website, HARN intranet, signage and LINE Official so that all stakeholders may acknowledge and conform to guidelines.
2. Communicates with its Director, Executives Employees and provides training to ensure their understanding of fraud anti-corruption measures, and disciplinary actions for non-compliance. The training includes an orientation session, and HARN Academy E-learning etc.

### 4) Oversight and Monitoring of Performance

To demonstrate commitment to countering corruption, as a listed company, it is the company's responsibility to foster confidence among shareholders and stakeholders, define has oversight and monitoring of performance, as follow:

1. The Board ensures that HARN commands an efficient system for anti-corruption to ensure that executives recognize and values anti-corruption and cultivates it as a corporate culture.
2. The Audit Committee supervises internal control, financial reporting, and other procedures concerning anti-corruption measures, steers conformance to anti-corruption measures, and reviews applicable measures and internal control to ensure that the measures are adequate and effective. The reviews risk assessment and provides recommendations to the Board on suggested practices to mitigate such risks.
3. The Audit Committee annually defines and reviews the Anti-Corruption Policy, provides recommendations and guidelines, monitors, and assesses performance, and steers and advocates risk management practices concerning anti-corruption and process-level corruption by assessing fraud and corruption risk and review anti-corruption measures for adequacy and suitability.
4. Top Executives establish risk assessment for business processes that may lead to corrupt practices, review the suitability of processes and measures, and personify proper behavior as well as communicating it to all employees and related parties.
5. Developed Risk & Control Self-Assessment for all units to apply as guidelines for assessing corruption risks in their respective business processes and for defining suitable internal control processes.
6. The Quality Management Division inspect and monitors the use operational on process the Anti-Corruption measures and monthly report on compliance outcomes to the Chief Operating Officer, Chief Financial Officer and the management meeting.
7. Internal Audit reviews items of potential the likelihood of corruption, and corporate efficiency for managing risks arising from corporate corruption and those at the operating level. Also reports to the Audit Committee and top executives when encountering items or actions that could undermine performance outcomes, including corruption.

Furthermore, the Boards review policies suitability and Anti-corruption Measures on March 29, 2023, was no significant change, remains consistent and suitable for changes of the business environment, rules, regulations, and the provision of laws. Details of the information on Policy Anti-Corruption are shown in <https://www.harn.co.th/corporate-governance/corporate-governance-policy/>

## Whistleblowing Policy and Guideline and Monitoring

### 1) Implementation Measures Whistleblow

The Board provide process and channels for complaints and whistleblowing and/or all forms of all complaints of all stakeholders through the following channels:

#### Channels and Methods of Whistleblowing

Complaints must explicitly spell out “confidential” to the Chairman of the Audit Committee which is an Independent Committee, through these channels.

##### Chairman of the Audit Committee



Harn Engineering Solutions Public Company Limited

559 Soi Soonvijai 4, Rama 9 Road, Bangkapi,  
Huaykwang, Bangkok 10310



chairac@harn.co.th



www.harn.co.th/  
corporate-governance/  
corruption-report/

#### Channels for Advice

Employees or others whom has inquiries and seek for advice on anti-corruption policy may contact through these channels.

##### Chief Financial Officer



Harn Engineering Solutions Public Company Limited

559 Soi Soonvijai 4, Rama 9 Road, Bangkapi,  
Huaykwang, Bangkok 10310



+(66)2 318-9744 ext.4004



wisit.w@harn.co.th

#### Channels Contact to HARN

Stakeholders can express their opinions, suggestions, and other complaints which are not an issue of anti-corruption through communication channels as follows:

##### Company Secretary



email: wasukan.b@harn.co.th



Tel: (02) 318-9744 ext.4011

##### Investor Relations



email: wirat.s@harn.co.th



Tel: (02) 318-9744 ext.5001

##### Mail



Harn Engineering Solutions Public Company Limited,  
559 Soi Soonvijai 4, Rama 9 Road, Bangkapi, Huaykwang, Bangkok 10310

1. Once the chairman of the Audit Committee receives a clue, or the company secretary or investor relations or any other channels receive clues and complaints from the stakeholders of HARN, a preliminary consideration will be made regarding the category of which the matter of the complaint received falls into. The cases will be collected to present to the sub-committees or related directors and all suggestions and issues will be summarized to present to the Board of Directors quarterly. Except for complaints and whistleblowing directly sent to the chairman of the Audit Committee, the chairman of the Audit Committee will personally open those letters.
2. Employee complaints or suggestions, HARN has a process for dealing with such by considering whether the employee's complaint is a matter that may be an offense and at what level in order to determine the penalties for the action with fairness and accuracy. To build confidence in the measures to protect and maintain the confidentiality of complainants, employees can complain and express opinions through a variety of channels such as through a comment box, LINE Official account of HARN, or direct notification via e-mail to the Human Resources Department. All employees are obligated to acknowledge the available complaint channels since their orientation as new employees.
3. HARN has established a suitable and fair process for punishing violators of anti-corruption measures. Any violation of this policy, direct or indirect, calls for disciplinary review under HARN's regulations, consisting of fact-finding, investigation, punishment, and appeal. They could also lead to punishment by law. Employees must therefore master and strictly conform to the Anti-Corruption Policy in every step of their work.

## **2) Actions when receiving complaints and reporting cl**

The Audit Committee will consider the complaints received and inform the relevant authorities in order to investigate the facts of the complaints and take appropriate corrective action. The Audit Committee will periodically monitor the progress. The relevant departments will notify the results within a reasonable period of time to the complainants. The Audit Committee will report to the Board of Directors.

## **3) Protection Measures Complainants and Whistleblow**

In order to protect the rights of whistleblowers with good intention, HARN will not disclose names, addresses or any other information that can identify the complainant or the whistleblower and keep the information of the complainant and whistleblower confidential. Only those responsible for the investigation of complaints will have access to such information. In this regard, the person receiving information from performing duties related to complaints have a duty to maintain information, complaints, clues and documentary evidence of the complainant and whistleblower confidential. No information is to be disclosed to any other person who does not have a relevant duty unless it is a disclosure in accordance with the duty required by laws. Measures, scope, and tools for whistleblower protection, as follow:

1. HARN's human resources administration process echoes its commitment to anti-corruption measures. Although refusal to take part in corruption may deprive HARN of business opportunities, its policy is not to demote, punish, or harm those that do so.
2. HARN's employees should not ignore actions in potential conflicts with anti-corruption measures. HARN has established channels for whistleblowing and protection of whistleblowers or those that need advice about conformance to anti-corruption measures.
3. HARN has established whistleblowing on corruption, Code of Conduct and non-compliance with laws and corporate regulations to define applicable criteria and guidelines that are suitable and uniform throughout the corporation. Protective measures and fair treatment are in place for whistleblowers or those that provide information, to overcome corruption seriously, strictly, and more efficiently.

Assigned by the Board of Directors, the Audit Committee acts as the main contact point for reporting incidents and clues, following up on incident reports, protecting and providing fairness to complainants or those who provide clues related to corruption within the organization, and reporting the results of the investigation and punishment to the Board of Directors. In 2023, there were **no cases** of fraud or violations of HARN regulations. In addition, it communicates acknowledged to all Board, Executives and Employees to the Good Corporate Governance, Code of Conduct and Anti-Corruption Measures o prevent complaints/whistleblowing of such issues.

### Complaint and whistleblowing statistics

	Reporting	Monitoring	Closing complaints
1. Code of Conduct	0	0	0
• Anit-Corruption	0	0	0
• Conflict of interest	0	0	0
• Compliance	0	0	0
2. Environment, Health and Safety	0	0	0
3. Society, Community, and Public Relations	0	0	0

### Performance under CG Code

HARN communicates and abides by corporate governance principles to all directors, executive directors and employees every year, and in 2023, following results:

1. 100% delivery of HARN’s corporate governance policy to newly appointed directors Communicate and emphasize adherence to business code of conduct, such as using insider information, conflicts of interest, and conflicts of interest, in continuous the Board meetings.
2. Assessed operational risks, compliance with laws, safety, health and environment, corporate reputation and corruption covering all parties involved. The risk control results were reported to the Risk Management Committee, Audit Committee and the Board every quarter. The results of the risk assessment of corruption and unethical actions in use of Inside Information, conflict of interest and ethics of the Board, Executives and Employees were at a satisfactory level **without any** wrongdoing found.
3. Communicate policies good corporate governance, code of conduct, measures anti-corruption, prevention of conflict of interest and prevention use of Inside Information to the Board, Executives and all employees which counts as 100% through e-mail, Intranet and Digital Signet to cultivate awareness and promote transparent, fair and verifiable operation behavior.

4. Organized internal training on Corporate Governance Policy and Principles, Code of Conduct and Anti-Corruption for new employees, including requiring a knowledge test. There were 25 employees in total who attended the training and passed the tests at 100%.
5. Organized E-Learning in the HARN Academy system as a learning medium on the good corporate governance, code of conduct, Anti-Corruption, prevention of conflict of interest and prevention use of Inside Information by yourself to knowledge for directors, executives and all employees in all areas thoroughly to cultivate and raise awareness, including requiring the comprehension test through online tests. There summary was 8 out of 8 directors who passed the tests, representing 100%, and 5 out of 5 executive who passed the tests, representing 100%, 235 out of 235 employees who passed the tests, representing 100%.
6. In 2023, HARN has announced information under material events within the timeframe specified by the authorities, this is to keep the securities trading in order, liquid, fair, and orderly. However, HARN and the Board, including Executives, **were not** fine or civil actions by regulatory corporate such as the SEC, SET or NACC etc., regarding corruption, good corporate governance, code of conduct, compliance with relevant laws, violation/non-compliance with the guidelines on share repurchase/deprivation of communication between shareholders/non-disclosure of agreements between shareholders, and violation/non-compliance with the guidelines on equity trading or asset trading, include there was **no case** where an independent director or a non-executive director resigned due to the issue of corporate governance of HARN.